

CITY OF DANA POINT**COMMUNITY SERVICES AND PARKS DEPARTMENT**

Michelle Mata
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Ste. 100
San Diego CA 92123
mmata@waterboards.ca.gov

RE: Reg Measure ID 375971: MMATA, Place:656901

Dear Ms. Mata:

The City of Dana Point appreciates the opportunity to comment on the Proposed General Waste Discharge Requirements for the Public Display of Fireworks – Tentative Order No. R9-2011-0022, NPDES No. CAG999002 and for the San Diego Regional Water Quality Control Board's efforts in coordinating the public workshops on this issue. We believe the public workshops proved to be productive in the development of this regulation.

We would like to comment and/or request clarification on a couple of items:

1. What is the purpose of the Public Fireworks Display Log? It is redundant with the Post Fireworks Display Report with the exception of the specific certification of FBMPP implementation. The certification of FBMPP could easily be added to the Post Fireworks Display Report Form which is required a mere five (5) days later.

In the spirit of efficiency, limited resources, streamlining paperwork and reporting, and the fact that the documents provide the same information (or can be easily modified to do so), please delete the requirement for the Public Fireworks Display Log and revise the Report Form to include the FBMPP certification.

2. Although the Instructions for Completing the NOI on page B-6 note that for a municipality a "duly authorized representative" can execute the Certification, which we feel is most appropriate, the Standard Provision on Page D-6, B.(c.) do not clearly provide that option. Please clarify that a "duly authorized representative" can execute the Certification statements.

We appreciate your consideration of these suggestions. Please do not hesitate to contact Lisa Zawaski at 949-248-3584 or lzawaski@danapoint.org if you have a question regarding our comments.

Respectfully,

Kevin Evans
Director of Community Services & Parks
City of Dana Point

cc: B. Fowler, L. Zawaski

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